



SHERWIN-WILLIAMS.

THE SHERWIN-WILLIAMS COMPANY
Environmental, Health & Regulatory Services
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July 28, 2009

Mr. Ray Klimcsak
U.S. Environmental Protection Agency – Region 2
290 Broadway 19th Floor
New York, New York 10007-1866

RE: Response to EPA Letter dated July 9, 2009
EPA's review of the Sherwin-Williams Company *May 2009 Supplemental Remedial Investigation Work Plan Sherwin-Williams/Hilliards Creek Site, Former Manufacturing Plant, Gibbsboro, New Jersey*

The Sherwin-Williams Company Sites – RI/FS Activities
Gibbsboro, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035

Dear Mr. Klimcsak:

The Sherwin-Williams Company (Sherwin-Williams) has prepared this reply in response to the U.S. Environmental Protection Agency (EPA) letter dated July 9, 2009 regarding EPA's review of Sherwin-Williams' revised *Supplemental Remedial Investigation Work Plan for the Sherwin-Williams / Hilliard Creek Site – Former Manufacturing Plant* dated May 26, 2009.

We are providing a point-by-point response to the detailed comments contained within the July 9, 2009 letter. In order to ease your review, we have included the text from that letter which is depicted in *italics*, and Sherwin-Williams' response immediately follows each EPA comment in **bold**. A copy of the July 9, 2009 letter is included as an attachment.

Comments

1. *EPA requests that Section 2.0 (Summary of Previous Investigations) be removed in its entirety. As discussed during a July 2, 2009 conference call, Section 2.0 can be replaced with the information presented in Section 1.4 and the supporting table (Page 5 of the May 2009 Work Plan).*

The text of the submission has been amended as requested. A revised copy of the text is included with this submission.

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2. *Work Plan, Table 4-1 – Please cite the correct units (i.e., mg/kg) for the inorganic compounds (in Soil).*

Table 4-1 has been revised to cite the correct units. A revised copy of the table is included with this submission.

3. *Please verify that the total linear distance values presented in Figure 1-3 and 1-5 are accurate.*

Figures 1-3 and 1-5 have been amended, and the total linear distance is no longer presented. Rather, the well-to-well distances have been verified and are used on the figures. As the cross-sections are not exact straight lines, Sherwin-Williams feels this is the more appropriate and accurate way to represent the distances on the figures. The revised figures are included with this submission.

4. *Quality Assurance Project Plan (QAPP), Section 2.2.2, Page 2-13 – Please verify that only “1” soil sample is being collected from the southern end of Silver Lake, as opposed to the text which states that “samples” are being collected.*

Only one soil sample location is noted for the southern end of Silver Lake. However, three samples will be collected from this location at the 0.0-0.5', 1.5-2.0', and 2.5-3.0' intervals. The proposed soil sampling protocol is discussed in detail on page 2-8 of Section 2.2.1 in the QAPP. As Section 2.2.2 noted above pertains to sediment and surface water sample collection, the reference to the soil location has been removed. A copy of the revised SAP/QAPP text is included with this submission.

5. *QAPP, Section 5.5, page 5-9 – It is stated in the text that surface water samples are to be collected from the “mid-point” of the water column, however, this is in contrast to earlier text which states that surface water samples are to be collected from approximately 0.5 ft above the sediment/surface water interface.*

The text of the SAP/QAPP has been revised to reflect the EPA's comment. The correct sample location as EPA has noted, is approximately 0.5 ft. above the sediment/surface water interface. A copy of the revised SAP/QAPP text is included with this submission.

6. *Tables 1-1 – 1-5 – Please remove all references to the “Gibbsboro 2008” screening levels.*

The “Gibbsboro” references for the screening levels have been removed and replaced with the term “Site-Specific”. Copies of the revised Tables 1-1 through 1-5 (from the SAP/QAPP) are included with this submission.

7. *Table 2-1 – The information provided for the collection of soil samples from within the former Lagoon Area does not address the collection of samples in “native soil” as opposed to set intervals.*

Table 2-1 of the SAP/QAPP has been revised to present the proposed sampling interval noted by EPA and the text of the SAP/QAPP and Work Plan. A copy of the revised SAP/QAPP Table 2-1 is included with this submission.

8. *Appendix B – As updated laboratory certifications become available for the analysis of interest, copies of the certifications should be provided to EPA and NJDEP.*

Sherwin-Williams has obtained up-to-date laboratory certifications for Test America Laboratories, Inc. - Edison, NJ and Burlington, VT facilities. These certifications are included with this submission in electronic format on CD.

In addition to written comments contained within EPA's July 9, 2009 comment letter, EPA verbally requested during the July 9, 2009 conference call, that a well construction table summarizing well depths, elevations and screen lengths be included in the revisions. This table, Table 2-1, “Summary of Monitor Well Depths, Elevations and Screen Lengths” is included with this submission.

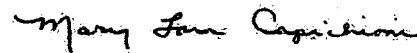
Please note that as part of this submission, Sherwin-Williams has included revised versions of the text, tables and figures that incorporate all the comments contained within this letter. Please replace the existing pages contained within the *Supplemental Remedial Investigation Work Plan for the Sherwin-Williams / Hilliard Creek Site – Former Manufacturing Plant* dated May 2009, with the revised pages included with this submission as detailed below.

1. The text of the *Supplemental Remedial Investigation Work Plan for the Sherwin-Williams / Hilliard Creek Site – Former Manufacturing Plant* dated May 2009 should be removed and replaced in its entirety with the text included with this response.
2. Table 2-1, “Summary of Monitor Well Depths, Elevations and Screen Lengths” should be placed in the “Tables” section in your document before table 4-1. This is a new table that does not replace any part of the existing document.
3. Figure 1-3 should be removed and replaced with the revised figure included with this response.
4. Figure 1-5 should be removed and replaced with the revised figure included with this response.
5. The text of the *Sampling and Analysis Plan and Quality Assurance Project Plan* dated May 2009 that is located in Appendix B, should be removed and replaced in its entirety with the text included with this response.

6. SAP/QAPP Tables 1-1 through 1-5 should be removed and replaced with the revised tables included with this response.
7. SAP/QAPP Table 2-1, "Summary of Field Sampling and Analysis Program" should be removed and replaced with the revised table included with this response.
8. Analytical Services Laboratory Certifications. The NELAC certifications for the selected laboratories are included in electronic format on CD. This is a new addition that does not replace any part of the existing document.

Should you have any questions or comments regarding this response, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,



Mary Lou Capichioni
Director Remediation Services

Attachment

cc: J. Josephson, EPA (New York)
M. Pensak, EPA (Edison)
W. Sy, EPA (Edison)
J. Doyon, NJDEP (4 copies)
J. Gerulis, Sherwin-Williams (w/o enclosures)
A. Danzig, Sherwin-Williams (w/o enclosures)
S. Peticolas, Gibbons, Del Deo, Dolan, Griffinger & Vecchione (w/o enclosures)
H. Martin, ELM
R. Mattuck, Gradient
S. Jones, Weston Solutions
S. Clough, Weston Solutions
A. Fischer, Weston Solutions